

Exhibit B

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation MDL No. 2327

Civil Action No. AMENDED SHORT FORM COMPLAINT				
below, incorporate The First Amended Master Complaint in MDL No. 2327 by reference.				
Plaintiff(s) further show the court as follows:				
1. Female Plaintiff				
2. Plaintiff's Spouse (if applicable)				
3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)				
4. State of Residence				
5. District Court and Division in which venue would be proper absent direct filing.				
6. Defendants (Check Defendants against whom Complaint is made):				
A. Ethicon, Inc.				
B. Ethicon, LLC				

	C. Johnson & Johnson			
	D. American Medical Systems, Inc. ("AMS")			
	E. American Medical Systems Holdings, Inc. ("AMS Holdings")			
	F. Endo Pharmaceuticals, Inc.			
	G. Endo Health Solutions Inc. (f/k/a Endo Pharmaceuticals Holdings, Inc.)			
	H. Boston Scientific Corporation			
	I. C. R. Bard, Inc. ("Bard")			
	J. Sofradim Production SAS ("Sofradim")			
	K. Tissue Science Laboratories Limited ("TSL")			
	L. Analytic Biosurgical Solutions ("ABISS")			
	M. Mentor Worldwide LLC			
	N. Coloplast A/S			
	O. Coloplast Corp.			
	P. Coloplast Manufacturing US, LLC			
	Q. Porges S.A.			
Basis of Jurisdiction				
	Diversity of Citizenship			
	Other:			
A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:				

7.

	B. Other allegations of jurisdiction and venue:		
8.	Defend	ants' products implanted in Plaintiff (Check products implanted in Plaintiff)	
		Prolift	
		Prolift +M	
		Gynemesh/Gynemesh PS	
		Prosima	
		TVT	
		TVT-Oturator (TVT-O)	
		TVT-SECUR (TVT-S)	
		TVT-Exact	
		TVT-Abbrevo	
		Other	
9. Defendants' Products about which Plaintiff is making a claim. (Check applicable products):			
		Prolift	
		Prolift +M	
		Gynemesh/Gynemesh PS	
		Prosima	
		TVT	

		TVT-Oturator (TVT-O)		
		TVT-SECUR (TVT-S)		
		TVT-Exact		
		TVT-Abbrevo		
		Other		
10.	Date of	Implantation as to Each Product:		
11. Hospital(s) where Plaintiff was implanted (including City and State)				
10	Implant	in a Surga an (a).		
12.	ппртап	ing Surgeon(s):		
13. Counts in the Master Complaint brought by Plaintiff(s):				
		Count I – Negligence		
		Count II – Strict Liability – Manufacturing Defect		
		Count III – Strict Liability – Failure to Warn		
		Count IV – Strict Liability – Defective Product		

Count V – Strict Liability – Design Defect
Count VI – Common Law Fraud
Count VII – Fraudulent Concealment
Count VIII – Constructive Fraud
Count IX – Negligent Misrepresentation
Count X – Negligent Infliction of Emotional Distress
Count XI – Breach of Express Warranty
Count XII – Breach of Implied Warranty
Count XIII - Violation of Consumer Protection Laws
Count XIV – Gross Negligence
Count XV – Unjust Enrichment
Count XVI – Loss of Consortium
Count XVII – Punitive Damages
Count XVIII – Discovery Rule and Tolling
Other Count(s) (Please state factual and legal basis for other claims below):

Attorneys for Plaintiff
, and the second